

11/13/06

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

VISIBLE SYSTEMS CORPORATION,

Plaintiff

v.

UNISYS CORPORATION,

Defendant

Civil Action No. 04-CV-11610-RGS

DEFENDANT'S MOTION TO FILE SUMMARY JUDGMENT
DOCUMENTS UNDER SEAL

Pursuant to Local Rule 7.2 of this District Court, the defendant, Unisys Corporation, respectfully moves for an order permitting it to file under seal all papers in connection with its Motion for Summary Judgment. The papers are being submitted to the Court herewith in a sealed envelope. The documents and information on which Unisys's Motion for Summary Judgment relies includes materials governed by a Confidentiality Agreement between the parties and a Protective Order entered by this Court on November 10, 2005. Pursuant to the terms of that Agreement and Order, Unisys is obligated to file such protected documents, and court papers disclosing their contents, under seal.

Pursuant to Local Rule 7.2(a), Unisys suggests that the Motion papers be filed with this Court in a clearly marked envelope or other packaging, to which the Clerk should attached a copy of this Court's order; and that upon further order of this Court dissolving any such order, the documents should be returned to Unisys's counsel.

WHEREFORE, Unisys respectfully requests that this Court issue an order permitting Unisys to file under seal all papers in connection with its Motion for Summary Judgment and that said papers be withheld from public inspection until further order of this Court.

Defendant,
UNISYS CORPORATION,
By Its Attorneys,

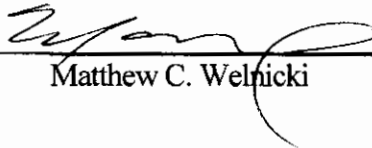


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Dated: November 13, 2006

CERTIFICATE OF SERVICE

I hereby certify that this document is being served this day on all counsel of record.


Matthew C. Welnicki